

1 DANIEL J. BERGESON, SBN 105439
2 dbergeson@be-law.com
3 JAIDEEP VENKATESAN, SBN 211386
4 jvenkatesan@be-law.com
5 ADAM C. TRIGG, SBN 261498
6 atrigg@be-law.com
7 BERGESON, LLP
8 111 N. Market Street, Suite 600
9 San Jose, CA 95113
10 Telephone: (408) 291-6200
11 Facsimile: (408) 297-6000

12 Attorneys for Defendant
13 PROTON MANAGEMENT LTD.

14
15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

17 ELECTRIC SOLIDUS, INC. d/b/a
18 SWAN BITCOIN, a Delaware
19 corporation,

20 Plaintiff,

21 v.

22 PROTON MANAGEMENT LTD., a
23 British Virgin Islands corporation; THOMAS PATRICK FURLONG; ILIOS CORP., a California corporation; MICHAEL ALEXANDER HOLMES; RAFAEL DIAS MONTELEONE; SANTHIRAN NAIDOO; ENRIQUE ROMUALDEZ; and LUCAS VASONCELOS,

24 Defendants.

25 Case No. 2:24-cv-8280-MWC-E

26 DEFENDANT PROTON
27 MANAGEMENT LTD.'S
28 STATEMENT RE PLAINTIFF
ELECTRIC SOLIDUS, INC. d/b/a
SWAN BITCOIN'S MOTION TO
SEAL EXHIBIT G TO DKT. 177

Judge: Hon. Charles F. Eick
Crtrm.: 750, 7th Fl.

TO THE COURT AND COUNSEL FOR THE PARTIES:

Defendant Proton Management Ltd. (“Proton”) respectfully submits this statement with regards to Plaintiff Electric Solidus, Inc. d/b/a Swan Bitcoin’s (“Swan”) Motion to Seal Exhibit G to Dkt. 177.

5 Proton stated to Swan that it would not oppose Swan's motion to seal
6 provided that Swan stated Proton's position, which is as follows: Proton does not
7 agree that that material highlighted in the newly redacted exhibit meets the standard
8 for sealing, or that Swan can retroactively seal a document (or parts thereof) that has
9 been publicly available for two months, which would ordinarily merit opposition. In
10 view of Swan's continuing position that Proton's participation in litigation waives
11 its right to compel arbitration, Proton will not formally oppose Swan's motion to
12 retroactively seal the document. In doing so, Proton reserves its right (i) to object to
13 the confidentiality of the proposed redacted material under the Stipulated Protective
14 Order, or (ii) to object to and oppose future attempts by Swan to seal the proposed
15 redacted material.

16 Swan agreed to communicate Proton's position but did not fully communicate
17 it, which is set forth here for the Court.

19 | Dated: June 26, 2025 BERGESON, LLP

By: /s/ Jaideep Venkatesan
Jaideep Venkatesan

Attorneys for Defendant
PROTON MANAGEMENT LTD.